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BellSouth Corporation
Legal Department
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April 15, 1998

Geraldine A. Matise
Chief, Network Services Division
Federal Communications Commission
Common Carrier Bureau
2000 M Street, N.W., Room 235
Washington, D.C. 20554

Re: Request for Expedited Declaratory Ruling
Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), CC Docket 92-237, Order on Reconsideration, Order on Application for Review, and Second Further Notice of Proposed Rulemaking, (Oct. 22, 1997) (*CIC Reconsideration Order*)
Ex Parte

Dear Ms. Matise:

In connection with BellSouth's earlier request for advice and assistance in connection with the proper interpretation of the requirements of the *CIC Reconsideration Order* as they relate to blocking the use of three-digit CICs, the following additional information pertains to the ability of switches within the BellSouth network to be preprogrammed in order to flash cut three-digit CIC blocking.[1]

[1] BellSouth maintains that blocking three-digit CICs can only be accomplished in a phased manner. BellSouth also explained that the *CIC Reconsideration Order* contains requirements that both three-digit and four-digit CICs are to be permissively used during the six month transition to four-digit CIC use (January 1, 1998 to June 30, 1998), and that "only four-digit CICs" will be recognized thereafter. BellSouth explained that it was uncertain whether it should begin phasing in three-digit CIC blocking during the permissive dialing transition period, which would ensure that "only four-digit CICs" will be recognized after June 30, but will not allow full permissive three- or four-digit CIC dialing during the transition period, or whether it should begin phasing in three-digit CIC blocking July 1, 1998, which will ensure full permissive dialing during the transition period but may allow inadvertently dialed three-digit CICs to be recognized during the two month period BellSouth requires to implement phased blocking, depending on when and where such calls are dialed.

As we have previously advised, BellSouth must complete 3,054.5 hours of translations work in 863 "host" switches within its network covering parts of Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, and Tennessee in order to block three-digit CIC calls.[2] These 863 switches are comprised of several different types provided by three different manufacturers. Some types have a technical preprogramming capability and some do not. Even with respect to those switch types that possess a preprogramming capability, however, a phased implementation is the more appropriate way to implement three-digit (3-digit) CIC blocking.

There are 139 switches in the BellSouth network that do not have a preprogramming feature and therefore cannot, as a technical matter, be preprogrammed to convert to three-digit CIC blocking on a July 1, 1998 flash cut.

BellSouth's 269 Nortel DMS 100 and 100/200 switches, have a "batch file" type preprogramming feature. BellSouth does not advocate the use of this feature for the following reasons:

- BellSouth does not currently use this preprogramming capability and is not comfortable with using it for a project of this magnitude. Our technicians have not been trained on this procedure. Adding a new and different way of performing translations in these switches for this one project will likely be confusing for many of the technicians.

- Translation changes in these switches are done in the "Standard Pretranslators" and must be done against every existing 3-digit CIC. The Standard Pretranslator is a translations table in the DMS 100 and 100/200 switch that lists every dialable CIC, both 3-digits and 4-digits, and gives the routing path for that CIC. Routing for all 3-digit CICs must be changed in this table from routing to the required trunk group to routing to the required announcement. Most offices have at least 5 of these tables (because of different routing required for different classes of service) that must be changed.

- Any work done in a preprogramming file requires the same amount of input time as would be required for the switch. This means that this work would have to be done at least 2-3 weeks prior to the requested July 1 date. The Standard Pretranslator is a very dynamic table. Changes are sometimes made daily. Any new translation work completed during the 2-3 week period could invalidate the preprogramming activations in the switches. Input of invalid data into a switch

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[2] Letter from Ben G. Almond, Vice President-Federal Regulatory, BellSouth to Magalie Roman Salas, Secretary, Federal Communications Commission (April 1, 1998). As explained therein, translations changes for an additional 750 remote switches are performed in the hosts.

could cause problems such as lost billing, incorrect routing of calls, customer trouble reports, etc. Also, any error in the table at the time the preprogrammed changes are input into the switch could cause the input to halt. This would cause confusion and additional work because a technician would have to stop and figure out what had and had not been input to the switch. It will be time consuming and unproductive for technicians to continuously modify the preprogrammed databases to reflect day to day dynamic changes. The flash cut under this scenario will still result in technicians and other BellSouth personnel experiencing an exceptional number of customer trouble reports and complaints to immediately handle. Under current procedures for Nortel switches, testing is performed after translation work completion for each individual 3-digit CIC, in order to insure that all 3-digit CICs have been appropriately blocked and routed to the correct announcement. This represents an efficient and quality of service procedure which minimizes customer trouble conditions and major network disruptions. It is also an efficient process inconjunction with managing the other concurrent work activities, involved with the centers.

As for BellSouth's 41 Nortel DMS 10 switches, these platforms do have a "preprogramming" type capability, but BellSouth does not recommend this procedure for the same basic reasons mentioned above for the other type DMS switches:

- Translation changes in the DMS 10 switches are done in the "Prefix Translators" and must be done against every class of service. The Prefix Translator is the table that defines on a digit by digit basis the proper routing of dialed digits. Several of these may exist in an office to allow for different routing by various classes of service. These translators must be changed from allowing the call to complete to sending the call to the correct announcement.

- Any work done in a preprogramming file requires the same amount of input time as would be required for the switch. This means that this work would have to be done at least 2-3 weeks prior to the requested July 1 date. This "Prefix Translator" is a very dynamic translator. Changes are sometimes made daily. Any work done on it 2-3 weeks prior could be invalid at the time of input to the switches. Input of invalid data into a switch could cause problems such as lost billing, incorrect routing of calls, customer trouble reports, etc.

- Testing of the 3-digit CIC capability for every class of service in the office is necessary to insure that all 3-digit CICs have been appropriately blocked and routed to the correct announcement.

BellSouth has 414 switches manufactured by Lucent that have a preprogramming feature. These switches can be preprogrammed either by creating a tape for switch input or

by utilizing the Mechanized Translation System. In either case, there are no appreciable benefits to be gained by utilizing this preprogramming feature for 3-digit CIC blocking versus the existing translation procedures currently used by BellSouth's personnel. In fact, the utilization of this feature increases work content on an overall basis in terms of performing the preprogramming work, database updates and subsequent follow-up testing requirements.

BellSouth's remaining 139 Siemens Stromberg Carlson DC0, RNS and Siemens EWSD switches have no preprogramming capability.

In sum, it takes more time to use preprogramming features than to phase in the switch translations. Moreover, a large number of switches cannot be preprogrammed. The Commission should not order a flash cut - a solution which no carrier has advocated.

BellSouth understands that Lucent switches do contain a "toggle" capability in addition to a preprogramming capability. The "toggle" capability is essentially the ability to turn off the 10XXX dialing option in switches by simply entering a command or with a touch of a key. This capability is not available in the Nortel and other non-Lucent type switches. BellSouth is currently considering the use of this "toggle capability" within its Lucent switches for 3-digit CIC blocking.

The Commission has inquired as to whether a carrier may "flash cut" the introduction of a new Numbering Plan Area (NPA) code, and if so, whether the same procedures can be used to implement three-digit CIC blocking.

NPA splits are not always introduced on a flash cut basis. NPAs that are "flash cut" may be done so because a split or overlay only affects a limited number of offices in a state at any one time. This means that the center that has the activity can use all of its own resources for the split/overlay. In other words, technicians that do not normally have responsibility for the affected offices can be utilized to assist the ones that do have the offices. Also, resources could be utilized from other centers in the region, if required.

This NPA Split/Overlay activity differs from the four-digit mandatory CIC conversion project in that the four-digit mandatory project affects all offices in all centers concurrently. Therefore, there are no spare resources available in any center, as there is with an NPA split or overlay.

BellSouth does not like to "flash cut" a new NPA because of the overload that misdialing by customers puts on announcement machines and the network. Also, all customer contact employees are inundated with trouble reports and/or customer questions. This includes operators, business office representatives, and repair service attendants. The overload of calls prevents them from handling other, more urgent requests. By phasing the

activity, this overload is minimized. The same is true of the current four-digit mandatory project. Phasing in the activity will reduce load on the network and on the customer contact employees.

Two recent examples of NPA splits within BellSouth that used the phased approach are:

- Florida (305 NPA). This split had three distinct mandatory dates: 3/1/96 for Paging, 8/1/96 for regular wireline customers, and 1/1/97 for cellular. The largest phase was for the wireline customers. It was spread over a two-week period.

- Florida (407 NPA). This split was a single phase, but it was implemented over a two-week period.

In sum, although flash cuts of new NPAs may be possible depending on the circumstances, it is preferable to reduce customer confusion by phasing the introduction of a new NPA. In any event, the circumstances are so different from the four-digit CIC conversion project that the analogy is not apt.

The Commission should allow phased blocking, but it should not order a pre-July 1, 1998 phased blocking. MCI has recently requested a change in the standard intercept message which by industry consensus has been developed. The standard message tapes have been ordered and this delivery has been scheduled. If the Commission acts favorably on MCI's request, it may be impossible to produce, order and install revised messages on a phased basis prior to July 1. Moreover, permitting phased blocking prior to July 1 arbitrarily shortens the permissive dialing period on an ad hoc basis throughout the country. It is in the public interest to allow phased blocking after July 1, 1998. No consumer will be harmed. Interexchange carriers (IXCs) have the responsibility to educate their customers that three digit CICs cannot be used after June 30. A standard intercept message will be used on all calls beginning July 1, advising that a three-digit CIC call "cannot be completed as dialed" and instructing the calling party on the use of four-digit CICs. All four-digit CICs will pass, except in those circumstances in which the Bureau has already determined that good cause has been shown for a waiver. Some three-digit CICs might pass, but this is only temporary, and should not give any IXC a competitive advantage over any other IXC.

BellSouth therefore requests that, pursuant to proper delegated authority, the Chief of the Common Carrier Bureau terminate the controversy concerning the appropriate time to implement three-digit CIC blocking and support BellSouth's schedule for completion of phased implementation of 3-digit CIC blocking in its nine-state territory by September 1, 1998. Thank

you for your kind consideration of this request. If you have any questions, please contact Ben G. Almond at (202) 463-4112.

Sincerely,

Theodore R. Kingsley

cc: Kris Anne Monteith
Renee Alexander
Ben G. Almond